

**FILED**

IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

★ JUL 22 2016 ★

RENA NAMER, on behalf of herself and all others  
similarly situated,

Plaintiff,

-against-

RETRIEVAL MASTERS CREDITORS BUREAU  
INC. a/k/a AMERICAN MEDICAL COLLECTION  
AGENCY,

Defendant.

**BROOKLYN OFFICE**

Docket No: 1:16-cv-01927-ARR-VMS

**STIPULATION OF DISMISSAL**

**IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned attorneys of record for Plaintiff and Defendant that, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff's individual claims against the defendant are dismissed without prejudice with leave to reinstate within 60 days of July 20, 2016, at which time the dismissal will automatically convert to a dismissal, as to Plaintiff's individual claims against the defendant, on the merits and with prejudice. The claims of the putative class members are dismissed without prejudice. Each party shall bear its own fees and costs.

Dated: July 20, 2016

LAW OFFICE OF ALAN J. SASSON, P.C.  
Attorneys for Plaintiff  
Rena Namer, on behalf of herself and all  
others similarly situated

HINSHAW & CULBERTSON LLP  
Attorneys for Defendant  
Retrieval Masters Creditors Bureau Inc. a/k/a  
American Medical Collection Agency

/s/Alan J. Sasson

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/s/Han Sheng Beh

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**SO ORDERED**

s/ARR

Honorable Allyne R. Ross  
United States District Court Judge